

July 31, 2003

BY HAND DELIVERY

Mr. John Muleta
Chief, Wireless Telecommunications Bureau
and
Mr. David Solomon
Chief, Enforcement Bureau
Federal Communications Commission
445 12th St. SW
Washington, DC 20554

Re: Interim Report for Tier III Carriers
Corr Wireless Communications, LLC
FRN: 0003-8041-01

Dear Sirs:

This letter constitutes the "Interim Report" required of Tier III carriers by the *Non-Nationwide Carrier Order*, released July 26, 2002. Since Corr Wireless Communications, LLC has fewer than 500,000 subscribers, it qualifies as a Tier III carrier. This report follows the format suggested by the "Further Guidance" Public Notice released on June 30, 2003.

We note initially that the path to Phase II compliance has not been a smooth one. Corr is a TDMA carrier in a world that is rapidly moving away from that standard. That historical accident has limited the menu of available options to provide E-911 Phase II. Corr is presently implementing a GSM overlay which obviously increases capital expenditures at a time when FCC-imposed obligations are also increasing, but Corr believes that this step will maintain its ability to remain competitive in the future. The implementation of the GSM overlay, including Phase I and II capability, will not be complete for some months, but Phase I capability will be maintained throughout the TDMA system until the network is fully transitioned to GSM.

Corr is presently supporting the petition of the "Tier III Coalition" to temporarily relieve small carriers of the obligation to meet the strictest performance obligations of Section 20.18 of the rules by forbearance. This request is predicated on the fact that rural systems cannot economically deliver the

Mr. John Muleta
Chief, Wireless Telecommunications Bureau
Mr. David Solomon
Chief, Enforcement Bureau
July 31, 2003
Page 2

triangulation needed to assure compliance with the 100 meter/67%, 300 meter/95% standards. We expect that we will have a Phase II system up and running by September 1, but we are relying on the manufacturer's representations that the system will meet the accuracy thresholds specified by the rules. In addition, small rural carriers find themselves very much at the mercy of equipment vendors whose systems and timetables are primarily driven by the requirements of the largest Tier I and Tier II carriers. Moreover, while the Phase II equipment vendors have assured the Commission and the industry that their systems can meet the Phase II accuracy standards found in Part 20, small carriers must be reliant on their commitments in that regard and are essentially powerless to devise a compliant Phase II system if the manufacturers cannot do so.

The vacillation of the larger carriers between various Phase II solutions had serious ripple effects on the small carrier community. As recently as last winter, Corr envisioned using a hybrid handset-network solution under an equipment proposal propounded by one of the major equipment vendors. However, when the Tier I carriers who were the major prospective purchasers of that system backed out, the economies of scale necessary to make that system available to other carriers disappeared. Thus, we suddenly found ourselves without a handset-based system less than eight months before the September 1 deadline. We then had to quickly re-evaluate network-based solutions, negotiate with manufacturers, and develop a plan to get a system installed in time. While we expect to be able to meet the FCC deadline, it will be tough and will require many pieces beyond our control to fall into place exactly as planned.

The specifics of PSAP requests and Corr's compliance plan are set out below:

1. Outstanding Phase I and II PSAP Requests:

Corr has received Phase I requests from the following municipalities/counties in Alabama:

Athens/Limestone County	Blount County	Cullman County
Etowah County	Huntsville/Madison County	Morgan County

Phase I service is being provided in each of these jurisdictions, as well as Marshall County, AL. Corr has also received PSAP requests for Phase I service in the following counties/city where it does not provide TDMA CMRS service:

Mr. John Muleta
Chief, Wireless Telecommunications Bureau
Mr. David Solomon
Chief, Enforcement Bureau
July 31, 2003
Page 3

	Cleburne County	Calhoun County	Autauga County
Dallas County	St. Clair County	Russell County	Sumter
County	City of Irondale		

Corr has received Phase II requests from Limestone, Madison, Morgan, Cullman and Etowah counties in Alabama.

2. Technology choice:

As noted above, Corr considered various alternative solutions to the 911 problem. As a TDMA carrier, its options in the handset area were non-existent. It decided to install a GSM overlay, in part to enable it to take advantage of the handset technology which we expected to be available. As it turned out, the major proponent of GSM handset solutions effectively abandoned the effort and we had to return to the far more costly network solution. Specifically, Corr has entered into a contract with Grayson Wireless to engineer a Phase II system, deliver the necessary equipment, and install and optimize it. The contract calls for the system to be operational in the Phase II counties identified above by September 1, and Corr is doing everything in its power to meet that deadline.

3. Status of ordering and installing equipment: See answer to Item 2, supra.

4. Anticipated availability date:

Given the delay caused by the abandonment of the handset solution, we do not anticipate initiation of service much before September 1. We expect that service will actually be available in the counties where PSAP requests have been received on or about September 1. Engineering studies are being done now to determine compliance with FCC accuracy requirements. The system will be able to locate both existing TDMA customers and new GSM customers.

Please contact the undersigned should you require further particulars about Corr's efforts to provide E-911 service in the timeframe specified by the Commission.

Yours very truly,

Mr. John Muleta
Chief, Wireless Telecommunications Bureau
Mr. David Solomon
Chief, Enforcement Bureau
July 31, 2003
Page 4

Donald J. Evans
Counsel for
Corr Wireless Communications, LLC

DJE:deb

cc: Bryan Corr